Why Should I Care?

Objective

This training manual is provided to you by the Defense Logistics Agency, Defense National Stockpile. The most important message from this document is that each individual within this organization is a key player in protecting the environment. Some questions you may be asking are: Why should I care? How can I possibly make a difference? And why now?

We hope the following information will provide you with some answers to these important questions.

First, environmental compliance is one of the main directives within the Defense National Stockpile's operating procedures; therefore, in order to do your job, you must adhere to the directives stipulated within the environmental policy. Also failure to comply with environmental legislation may incur harm to human health or the environment and maybe even have legal ramifications. But more importantly, it is our hope that each of you will embrace the doctrines of environmental stewardship.

Environmental stewardship can be defined as the responsible, long-term management of resources in a way that minimizes harm to humans and the environment. Although the term environmental stewardship may be relatively new, the ideas behind this philosophy have been around for a long time. As early as 1898, Gifford Pinchot, considered the "father of conservation," wrote about the interconnection and interdependence of all elements within the environment. He felt that land use should be managed so that it can benefit those who live here NOW. The philosophy of resource management was important, but the effect of this management on future land use was given little thought until Rachel Carson published her book, *Silent Spring*. Ms. Carson was a zoologist who was very successful writing scientific information in such a way that it also educated and inspired the public. *Silent Spring* (first published in 1962) talked about the bioaccumulation of DDT and the effect it had on the surrounding ecology. It documented the effects that application of DDT had on the interconnection of plant, soil and animal. It pointed out that the effects of these applications did not diminish with time, rather, they accrued more toxic substance.

These effects could potentially result in the depletion of all songbirds-hence the name *Silent Spring*. There were numerous individuals who were important to the environmental revolution. Some, such as John Muir (one of the founders of the Sierra Club), Henry David Thoreau, and George Perkins Marsh, felt that nature was of such intrinsic value and beauty that it should be preserved at all costs. They championed preservation of the land and protection from the human species. As scientific measurements became more sophisticated, it became easier to document environmental interdependence. For example, we knew how much of a pesticide was applied to the plants; we could measure how that pesticide accumulated in the water, air, and soil; and then we could see what effect that had on the surrounding wildlife. This was valuable information and individuals such as Jan C. Smuts and Barry Commoner explored in depth these interrelations, finally documenting environmental interdependence. These individuals, and too many others to name in this document, cared enough to undertake the challenges of affecting change, and we were able to use these valuable lessons and enact environmental legislation.

As this environmental awareness was awakening, our environmental barometers were also sounding alarms. In 1969, the Cuyahoga River, flowing through Cleveland, Ohio, actually caught on fire, and a spill off the coast of California had left millions of gallons of oil along the coastline. As far back as the industrial revolution during the late 1800's, large industrial cities such as Chicago and Cincinnati enacted air quality regulations. During the 1940's, serious smog incidents in Los Angeles, California and Donora, Pennsylvania raised public concern and precipitated the inception of the Air Pollution Control Act of 1955. Although some environmental legislation was passed prior to 1960, the majority of legislation was propagated and enacted during the 1960's and 1970's. Table 1 lists some of the federal environmental laws that impact DNSC activities. DNSC

Rachel Carson was a federal employee for fifteen years with the U.S. Fish and Wildlife Service. She was able to incorporate her work experiences into many of her literary works. She believed in the interdependence of the environment and humankind. Our world is richer due to her literary legacy such as *The Sea Around Us* (1951) and *Silent Spring* (1962).

Rachel Carson

TABLE 1
PERTINENT FEDERAL LAWS THAT IMPACT DNSC ACTIVITIES

YEAR ENACTED	STATUTE	ENFORCEMENT OBJECTIVES	DNSC ENFORCEMENT INVOLVEMENT
1970	**National Environmental Policy Act (NEPA)** *Regulation: 42 USC 4321-4370; various topical areas throughout CFR including 7, 10, and 29.*	One of the most far-reaching environmental policies. Its purpose is to encourage a harmony between activities in business, social communities, and the environment. Although much of the language is vague, it addresses issues to attain the widest range of beneficial use of resources without causing undesirable effects to the environment.	Literally all activity undertaken by the DNSC is somehow governed by this act. One such important activity is the mercury environmental impact study.
1970	**Occupational Safety and Health Act (OSHA)**	This act regulates the handling and managing of hazardous materials in the workplace by providing employee "right-to-know" information and emergency response training.	DNSC depots maintain a complete set of material safety data sheets (MSDS) for commodities/chemicals stored and used at the installation. Depots also insure that Fire Departments and local Emergency Response Departments are aware of depot activities and commodities/chemicals stored.
1970	**Clean Air Act (CAA)** *Regulation: 40 CFR 50-99*	Emissions of pollutant to the atmosphere are regulated by this act. Enforcement is done through the requirement of state air quality implementation plans and operating permits for sources of toxic and hazardous air pollutants.	No DSNC facility operation requires permitting. Fugitive dust generated during out loading of ores, minerals and metals may potentially fall within this legislation. DNSC depots assure that dust generated either on the roadways or during out loading is minimized through the application of water or other engineering devices (ex. fans, alternate loading procedures).
1972	**Federal Insecticide, Fungicide & Rodenticide Act (FIFRA)** Regulation: 40 CFR 150-189	This law provides information for the environmentally safe use of pesticides and herbicides.	Each DNSC depot follows a Pest Management Plan that includes the requirements for application/use of these chemicals as warranted.
1972	**Clean Water Act (CWA)** *Regulation: 40 CFR 100-145; 220-232; 410-471*	Provisions for regulating discharge of wastewater to rivers and streams or to publicly owned treatment works are included within this policy.	DNSC have spill prevention and storm water run-off plans as dictated within this act. These are "living" documents and change as the facility and its stored commodities change. Depot personnel receive annual training to assure they are aware of these changes. Also depot personnel are an integral part in defining best management practices (BMP's) that can be used to insure the directives within this law are met.

TABLE 1 (CONTINUED)
PERTINENT FEDERAL LAWS THAT IMPACT DNSC ACTIVITIES

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1974	**Safe Drinking Water Act (SDWA)** *Regulation: 40 CFR 40*	Standards for drinking water quality and operation of public water treatment plants, as well as injection of wastes (including septic tanks) are all addressed within this act.	Most of the DNSC locations are on public water supplies and are not directly affected by this legislation; however, depots that use private wells for their water supply are required to test their water to assure it meets requirements defined in this legislation. Additionally, all water fountains used at every installation must have their water tested for lead.
1975	**Hazardous Material Transportation Act (HMTA)** *Regulation: 49 CFR 100-180*	The Department of Transportation regulates this act and it includes laws about all packaging and transportation of hazardous materials.	DNSC facilities transport commodities that may fall within this guidance, all shipping orders contain specific procedures for transport of such commodities.
1976	**Toxic Substances Control Act (TSCA)** *Regulation: 40 CFR 700-799*	Regulation of the manufacture and use of most chemicals including asbestos and polychlorinated biphenyls (PCB's) are included within this legislation. Reporting, labeling, use restrictions, and record keeping of chemicals that pose risk to health and the environment are required.	DNSC has removed PCB containing transformers from all depots, and all stored asbestos has been removed; however, annual reporting is done for structures still containing asbestos.
1976	**Resource Conservation & Recovery Act (RCRA)** *Regulation: 40 CFR 240-299*	Generation, transportation, treatment, and disposal of hazardous and non-hazardous wastes are discussed within this act. Storage of fuel within underground storage tanks is also addressed.	DNSC depots maintain strict compliance with and make improvements to their operations to better address all the facets of this law. Also, most facilities have or had underground storage tanks used for fuel storage. Those facilities maintain current licenses and permits as required by governing agencies.
1980	**Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)** *Regulation: 40 CFR 300-311*	This act is usually referred to as the "Superfund" act and requires reporting hazardous substance spills while establishing liability for cleanup of the spills. The law has provisions that delineate potentially responsible parties (PRP's) so they can assess liability for cleaning up former spills.	As you can imagine this can be a legal nightmare and is one that the DNSC will have continued involvement. As we leave sites, assessments are done to see what "footprint" our storage has made on the environment. Past land use has a huge impact on these findings. Although negative impacts may not have been part of DNSC operating procedures, we may be held

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			accountable. DNSC depots make every effort to assure we have data and knowledge of past and present operating procedures. Also, in order to comply with this law, depot personnel interact and establish community relation advisory boards (CAB's).
1986	**Emergency Planning and Community Right to Know Act (EPCRA)** *Regulation: 40 CFR 350-374*	This law is also known as Title III of the Superfund Amendment Reauthorization Act (SARA title III). It provides employees and citizens access to information about hazardous substances/material in their community.	DNSC depots annually submit information (Toxic Chemical Inventory Form, Toxic Chemical Release Form) to governing agencies listing substances and commodities relative to this act. Additionally DNSC depots maintain and make accessible all Material Safety Data Sheets (MSDS) relative to depot operations. Depots also follow directives stipulated in their emergency planning notification document, as regulated by this act.

operations are also governed by state and local agencies, as well as, the United States Department of Defense.

Some legislation included within the Department of Defense includes the regulation of natural and cultural resources. Natural resources include: wetlands, soils, wildlife, forestry and rangeland management. Cultural resources include: historic preservation, Native American issues, pest management, archeological protection and curation of known artifacts. Although federal legislation may dictate the effective management of some of these topics, the US Department of Defense is very specific about the handling of such issues. The National Defense Stockpile has contracted with the Parks and Wildlife Service to complete both natural and cultural assessments of each depot.

This interesting information will not only enhance your knowledge of your surroundings, but will also provide you with the rich history of some of these installations. You will find that in most cases, the depots were formerly used defense sites with responsive operations directly supporting the war effort. Some depots have been involved in military activity since the Civil War. Along with the military action, depots have maintained and regulated land use, including soil, water and wildlife.

All of this activity has made an environmental impact on the surroundings you work within. Most of our facilities are the last untouched, open spaces affording proliferation of many forms of animal and plant life within urbanized / industrialized areas. It is important to notice what negative and positive impacts we have made in support of our armed forces. Supporting the military effort has always been the primary objective of the Defense National Stockpile, and although these activities may have had adverse affects, we are proud to be a part of the war effort. Through proactive response to environmental legislation, we will continue to support our military objective while being responsible environmental stewards.

"For two reasons, our generation will bear a heavier responsibility for the future of planet Earth than any generation before others. First, we know better – having gained access to an unprecedented wealth of new scientific information and a vastly improved capacity for analysis and prediction. Second, we can do better – having accumulated enough experience, technological and institutional, to take the necessary actions."

Peter Sand "Lessons Learned in Global Environmental Government" (18 Envtl. Aff. L. Rev 1 [1990])